

Maclean(Gannon), Christine

From: WorkSafeBC [prevweb@worksafebc.com]
Sent: Tuesday, May 01, 2007 10:31 AM
To:
Subject: SPAM: Your submission has been received - #070502

Submission ID: P09.JL6.T12.06H

Part 3: Rights and Responsibilities, relating to occupational first aid

1. Name: William A. Downey

(a) Feedback is provided: on own behalf

Organization: Job Title:

(b) Feedback is provided: from a worker's perspective

2. E-mail:

3. Feedback:

Section #:3.1

Comments: I am concerned that the Reg still provides considerable opportunity for high-risk small operations to operate without adequate requirement for health and safety programs. I am also concerned that no definition, or criteria for definition, of the risk categories is included in the section.

Section #:3.2

Comments: The inclusion of this section, segregating and downgrading requirements for small operations, creates considerable confusion as to the applicability of other sections of the Reg, such as 3.5, 3.8, etc. Wording is needed to clarify this point. More substantially, 3.2 erodes the support for workers' safety in small operations. Since our experience provincially has been that many large operations have been broken up into sub-contracted small operations, the concern is that work which was, and should be, governed by a requirement for a substantial and properly resourced health and safety program, is now/can be too readily moved into "informal" requirements at the expense of worker safety.

Section #:3.16

Comments: I am very pleased to see specific requirements, rather than "performance-based" artifice, established again in the Reg. Again, however, I am concerned that there is no definition, or criteria for definition, of the risk categories included in this section. We are learning, at workers' expense, that what have casually been considered low-risk environments actually included life-threatening hazards, substances and circumstances requiring identification and specific address.

4. Please indicate your level of support of the proposed amendments:generally agree

5. If you agree or disagree with the proposed amendments, please provide reason(s):

Section#: 3.1

Comments: Not satisfied, as noted. Too many workers left in informal, small operations, programs.

Section#: 3.16

Comments: Support, excepting need for specificity re: levels of risk criteria.

Section#: 3.20

Comment: Support as amended.

Schedule#: 3A

Comment: Very happy to have the specific requirements established. I find it extraordinary though that single workers in moderate and high risk activities are only required to be provided with a Personal first aid kit, when this would plainly be inadequate to address the nature and extent of potential injury. If anything, they're more likely to need a Level 1 kit, given the work alone situation. This is, after all, just the kit I carry in my vehicle routinely.

Maclean(Gannon), Christine

From: WorkSafeBC [prevweb@worksafebc.com]
Sent: Tuesday, May 01, 2007 11:34 AM
To:
Subject: SPAM: Your submission has been received - #070502

Submission ID: P09.JL6.Y82.T0X

Part 4: General Conditions, relating to working alone or in isolation

1. Name: William A. Downey

(a) Feedback is provided: on own behalf

Organization: Job Title:

(b) Feedback is provided: from a worker's perspective

2. E-mail:

3. Feedback:

Section #:4.20

Comments: I support the section. The definition is a significant improvement in the understanding of contemporary risk. The requirement of prior hazard assessment and mitigation seems to address the long-standing concern that a check-in procedure was somehow an adequate response to evident hazards for solo workers.

4. Please indicate your level of support of the proposed amendments:generally agree

5. If you agree or disagree with the proposed amendments, please provide reason(s):

Section #:4.20.2(b)

Comments: "practicable" is where the rubber hits the road. This will require interpretation through enforcement, since , for certain employers, it is never practicable to effectively address the type of hazards involved here. As an example, it has routinely been the case that budgetary and operational constraints make it "not practicable" to ensure that child protection workers are adequately supported and equipped on investigation visits - situations which police officers attend armed, wearing personal protective equipment, equipped with a panoply of communications, and with back-up on priority.